COMMENT on RM-11392

I , Jay Townsend, Amateur Radio Station Operator, WS7I, come before you supporting the Rule Making RM-11392. Having been licensed for over 40 years and having been involved in Digital Communications for 30 years it is important that we finally address some of the problems that have been created in our Amateur Radio Service.

I have come before this Commission a number of times in Digital matters and have a long and extensive background in Digital Communications. I have been involved with cutting edge Digital Communications for many years. I have experimented with Clover, Clover I, Clover 2000, Pactor, Amtor, RTTY, PSK, and other modes.

I have operated around the world and in most parts of the world bands and band planning is done according to bandwidth. Mixing 500 Hz modes or less with wider modes has not historically met with any success. We dealt with this during the years of packet radio. It is apparent that mixing bandwidths is not a good solution for the Amateur Radio Service.

The Proposed Rule Making details part of one mode that it discusses, Pactor III. I am not at all sure that the data given for the mode is actually how the mode fully functions. I would urge the FCC to test an actual unit in operation and see if the bandwidth specifications are what the unit actually produces.

Modes that shift frequency and increase frequency usage after initiation of contact like Clover and Pactor III are not suitable in the narrow band regions of the digital area. As they increase in bandwidth they necessarily have the potential to cause interference to others using the spectrum. Few users have the ability to determine what is in any given 2.5 Khz using Amateur receivers and typical programs. There has also always been the problem that an Automatically controlled station may be accessed by a station in one given direction and especially on the low bands that station may radiate equally in a totally different direction and cause inadvertent interference.

If there is a need for wide band digital communications on HF then it is certainly apparent that we need to move back to having a very small and very distinct area for these systems to operate within. This was what was done prior to many of the current rule makings which apparently have left Amateur operators and amateur bands in disarray. Mixing 200 Hz modes like RTTY with modes taking up over 10 times the spectrum at 2.0 Khz leads to many mutual problems.

Having read some of the other comments on RM-11392 and in particular those that discuss the "Emergency Management" rational behind the need of wide band digital communications. I must comment that it is interesting to note that many of the original Winlink 2000 stations and indeed there entire system(s) have already started moving to other Services outside that of the Amateur Radio Service.

You will now find that they are affiliated with the Military Amateur Radio Service (MARS) which is of course a government entity that uses radio channels that are totally free from interference and these frequencies are tightly controlled by the government. Of course they are also not subject to FCC Rules & Regulations in other areas either.

Note this reference site that shows the status of stations:

http://www.winlink.org/status/PMBOStatus.aspx

The number of MARS stations can be determined from the calls listed. E.g. AAB#, NNx# and so forth. There are now more of these stations that are NOT Amateur Radio Service than there are that are Amateurs. Of course all Amateur operators can join MARS.

So in conclusion I support the proposed rule making RM-11392 as we need to return to clarity in the digital segments of our spectrum.

Respectively Submitted,

Jay Townsend